



**Bernstein-Burkley, P.C.**  
**Keri P. Ebeck, Esquire**  
**Bar No. 262092017**  
**707 Grant Street, Suite 2200, Gulf Tower**  
**Pittsburgh, PA 15219**  
**(412) 456-8112**

**Order Filed on April 6, 2020**  
**by Clerk**  
**U.S. Bankruptcy Court**  
**District of New Jersey**


**ATTORNEY FOR CREDITOR: REGIONAL ACCEPTANCE CORPORATION**

In re:	Bankruptcy No. 19-32744-ABA
FRANCIS J. GILLEN	Chapter 13
Debtor,	Related to Doc. No. 11

**CONSENT ORDER RESOLVING OBJECTION TO CHAPTER 13 PLAN DATED**  
**DECEMBER 19, 2019**

The relief set forth on the following pages, number one (1) through seven (7) is hereby  
ORDERED.

**DATED: April 6, 2020**

  
\_\_\_\_\_  
Honorable Andrew B. Altenburg, Jr.  
United States Bankruptcy Court

Debtors: Francis J. Gillen  
Case No.: 19-32744-ABA  
Caption of Order: Consent Order Resolving Objection to Plan

---

1. On or about December 12, 2015, Debtor purchased a 2015 Chevrolet Impala Sedan 4D LTZ, VIN #2G1165S35F9219261 (the “Vehicle”), pursuant to a Retail Installment Sale Contract (the “Contract”) with the Regional Acceptance Corporation (RAC).
2. The Contract requires monthly payments of \$699.22 at an interest rate of 14.95%.
3. As of the Petition Date, the outstanding balanced owed to RAC by Debtor pursuant to the above-referenced Contract was \$22,859.82. These amounts are reflected in the Proof of Claim filed by RAC on January 10, 2020 at Claim No 2-1.
4. Debtor’s Chapter 13 Plan filed December 19, 2019 proposes payment to RAC in the amount of \$5,316.62 at 0.0%.
5. RAC filed its objection to Debtor’s Chapter 13 plan on January 21, 2020 at Doc No. 18 (“Objection”).
6. In order to resolving the pending the Objection, the parties agree as follows:
  - a. RAC shall have a secured claim at Claim No 2-1, in the amount of \$13,500.00 at 6%, for a total secured claim of \$15,660.00.
  - b. The terms of this Consent Order shall be incorporated into the Debtor’s Chapter 13 plan and any subsequent plan filed thereafter.
  - c. RAC and Claim No. 2-1 shall be paid inside the Debtor’s Chapter 13 Plan.

Debtors: Francis J. Gillen  
Case No.: 19-32744-ABA  
Caption of Order: Consent Order Resolving Objection to Plan

---

- d. Any conversion or dismissal of this case shall void the terms of the consent order.
7. RAC hereby consents to service of any amended plan by and through its undersigned counsel.

<u>/s/ Keri P. Ebeck</u> Keri P. Ebeck , Esquire Bernstein-Burkley, P.C. 707 Grant Street, Suite 2200 Gulf Tower Pittsburgh, PA 15219 (412) 456-8112 Email: <a href="mailto:kebeck@bernsteinlaw.com">kebeck@bernsteinlaw.com</a>	<u>/s/ Seymour Wasserstrum</u> Seymour Wasserstrum Law Offices of Seymour Wasserstrum 205 West Landis Avenue Vineland, NJ 08360 (856) 696-8300 <a href="mailto:mylawyer7@aol.com">mylawyer7@aol.com</a>
---	---

Dated: April 2, 2020

Certificate of Notice Page 4 of 4

United States Bankruptcy Court  
District of New Jersey

In re:  
Francis J Gillen  
Debtor

Case No. 19-32744-ABA  
Chapter 13

**CERTIFICATE OF NOTICE**

District/off: 0312-1

User: admin  
Form ID: pdf903

Page 1 of 1  
Total Noticed: 1

Date Rcvd: Apr 06, 2020

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on  
Apr 08, 2020.

db +Francis J Gillen, 4 Kenneth Court, Sewell, NJ 08080-4115

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
NONE. TOTAL: 0

\*\*\*\*\* BYPASSED RECIPIENTS \*\*\*\*\*

NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.  
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

**I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Apr 08, 2020

Signature: /s/Joseph Speetjens

---

**CM/ECF NOTICE OF ELECTRONIC FILING**

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on April 6, 2020 at the address(es) listed below:

Denise E. Carlon on behalf of Creditor BANK OF AMERICA, N.A. dcarlon@kmlawgroup.com,  
bkgroup@kmlawgroup.com  
Isabel C. Balboa ecfmail@standingtrustee.com, summarymail@standingtrustee.com  
Keri P. Ebeck on behalf of Creditor Regional Acceptance Corporation kebeck@bernsteinlaw.com,  
jbluemle@bernsteinlaw.com  
Seymour Wasserstrum on behalf of Debtor Francis J Gillen mylawyer7@aol.com,  
ecf@seymourlaw.net;r47769@notify.bestcase.com  
U.S. Trustee USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 5